

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

MIDAS GREEN TECHNOLOGIES, LLC,

*Plaintiff,*

v.

Civil Action No. 6:22-CV-00050-ADA

RHODIUM ENTERPRISES, INC., *et al.*,

*Defendant.*

**JOINT NOTICE OF STIPULATION TO MODIFY DEADLINE**

Pursuant to the Court's Amended Standing Order Regarding Joint or Unopposed Request to Change Deadlines, dated March 7, 2022, Plaintiff Midas Green Technologies, LLC ("Midas") and Defendants Rhodium Enterprises, Inc., Rhodium Technologies LLC, Rhodium 10mw LLC, Rhodium 2.0 LLC, Rhodium 30mw LLC, Rhodium Encore LLC, Rhodium Renewables LLC, Rhodium Renewables Sub LLC, and Rhodium Ready Ventures LLC ("Rhodium Defendants") (collectively, "Parties") hereby jointly notify the Court of the Parties' stipulation to modify the close of expert discovery deadline with respect to multiple expert witness depositions.

Pursuant to the Court's Amended Scheduling Order (Dkt. 139), the deadline for the close of expert discovery is February 9, 2024. Due to scheduling conflicts, the Parties have agreed to conduct the depositions of (i) Dr. Himanshu Pokharna; (ii) J. Duross O'Bryan; (iii) Dr. James Lee; (iv) Dr. Alfonso Ortega; and (v) Juli Saitz after the close of expert discovery deadline and on or before February 19, 2024.

These extensions will not extend the deadline for any final submission that affects the

Court's ability to hold a hearing, trial, or other Court date, nor will these extensions change the date of any hearing, trial, or other Court date. Finally, these extensions will not require any other modifications to the Court's schedule.

Dated: January 31, 2024

Respectfully submitted,

*/s/ Joseph E. Thomas*

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*/s/ Melissa R. Smith*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record are being served with a true and correct copy of this document via the Court's CM/ECF system on January 31, 2024.

*/s/ Melissa R. Smith*

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Melissa R. Smith